

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-cr-14013-Cannon/Maynard

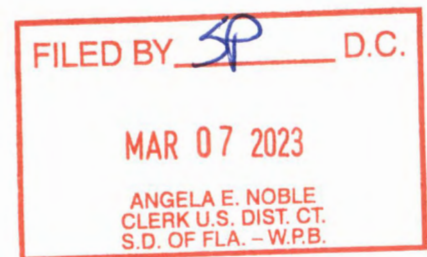
8 U.S.C. §1324(a)(2)(B)(ii)
8 U.S.C. § 1326(a) & (b)(2)
8 U.S.C. § 1327
18 U.S.C. § 982(a)(6)
18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA,

vs.

RAYMOND SAUNDERS and
CARLOS RODRIGUEZ-RODRIGUEZ,

Defendants.



INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNTS 1 THROUGH 76

On or about February 22, 2023, in Martin County, in the Southern District of Florida,
the defendants,

**RAYMOND SAUNDERS
and
CARLOS RODRIGUEZ-RODRIGUEZ,**

did knowingly bring, and attempt to bring, an alien, as set forth in Counts 1 through 76 below, to the United States for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such alien had not received prior official authorization to come to, enter, and reside in the United States, regardless of any

official action which might later be taken with respect to such alien:

<u>Count</u>	<u>Alien</u>
1	L.P-L. (YOB: 1984)
2	J.K. (YOB: 1985)
3	A.F. (YOB: 1995)
4	J.J. (YOB: 1992)
5	A.J. (YOB: 1963)
6	J.J. (YOB: 2000)
7	J.P. (YOB: 1990)
8	S.G. (YOB: 1994)
9	T.B. (YOB: 1995)
10	G.S-S (YOB: 1999)
11	H.P. (YOB: 2003)
12	L.P. (YOB: 1993)
13	G.J. (YOB: 1992)
14	A.N. (YOB: 1996)
15	R.K. (YOB: 2003)
16	C.B. (YOB: 1986)
17	D.M-A. (YOB: 1977)
18	A.S-C. (YOB: 2015)
19	D.C. (YOB: 1986)
20	S.P-P. (YOB: 1994)
21	J.G.J-J. (YOB: 2000)
22	W.Y. (YOB: 1978)
23	A.T. (YOB: 1992)
24	F.I. (YOB: 1980)
25	E.A. (YOB: 1990)
26	K.S. (YOB: 1987)

<u>Count</u>	<u>Alien</u>
27	E.I. (YOB: 1993)
28	M.A. (YOB: 1992)
29	E.S. (YOB: 2005)
30	C.J-F. (YOB: 1989)
31	W.J. (YOB: 1986)
32	L.J. (YOB: 1996)
33	J.V. (YOB: 1988)
34	C.J. (YOB: 1993)
35	Y.F. (YOB: 1993)
36	L.P. (YOB: 1985)
37	J.T. (YOB:1998)
38	S.J. (YOB: 1990)
39	J.P. (YOB: 1985)
40	S.J. (YOB: 1998)
41	L.U. (YOB: 1994)
42	J.G. (YOB: 1998)
43	S.F. (YOB: 1980)
44	R.J. (YOB: 1972)
45	M-N.J. (YOB:1997)
46	S.V. (YOB: 1997)
47	A.J. (YOB: 1987)
48	B.J. (YOB: 1981)
49	N.A. (YOB: 1998)
50	L.E.F. (YOB: 1997)
51	L.E. (YOB: 1997)
52	N.V. (YOB: 2000)
53	B.J. (YOB: 1995)

<u>Count</u>	<u>Alien</u>
54	J.J. (YOB: 1999)
55	J.M.W. (YOB: 1995)
56	E.J. (YOB: 1977)
57	L.M. (YOB: 1989)
58	K.A. (YOB: 1998)
59	R.M. (YOB: 1996)
60	D.A. (YOB: 1985)
61	J.W. (Minor)
62	S.P. (YOB: 2007)
63	B.C. (YOB: 1971)
64	V.A. (YOB: 1988)
65	B.M. (YOB: 2016)
66	M.L. (YOB: 1995)
67	G.N. (YOB: 2000)
68	S.J. (YOB: 1990)
69	C.L. (YOB: 1988)
70	M.T. (YOB: 1996)
71	V.M. (YOB: 1992)
72	D.E. (YOB: 1992)
73	E.J. (YOB: 1991)
74	J.S. (YOB: 1996)
75	T.J-R. (YOB: 1982)
76	R.M. (YOB: 2009)

In violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii) and Title 18,
United States Code, Section 2.

COUNT 77

On or about February 22, 2023, in Martin County, in the Southern District of Florida,
the defendant,

RAYMOND SAUNDERS,

an alien, having previously been removed from the United States on or about January 12, 2017, did enter, and attempt to enter, the United States, knowingly and unlawfully, without the Attorney General of the United States or his/her successor, the Secretary of Homeland Security (Title 6, United States Code, Sections 202(3), 202(4), and 557) having expressly consented to such alien reapplying for admission to the United States, in violation of Title 8, United States Code, Sections 1326(a).

COUNT 78

On or about February 22, 2023, in Martin County, in the Southern District of Florida,
the defendant,

CARLOS RODRIGUEZ-RODRIGUEZ,

an alien, having previously been removed from the United States on or about November 9, 2009, did enter, and attempt to enter, the United States, knowingly and unlawfully, without the Attorney General of the United States or his/her successor, the Secretary of Homeland Security (Title 6, United States Code, Sections 202(3), 202(4), and 557) having expressly consented to such alien reapplying for admission to the United States, in violation of Title 8, United States Code, Sections 1326(a) and 1326(b)(2).

COUNT 79

On or about February 22, 2023, in Martin County, in the Southern District of Florida,
the defendant,

RAYMOND SAUNDERS,

did knowingly aid and assist an alien, Carlos Rodriguez-Rodriguez, to enter the United States, said alien being inadmissible under Title 8, United States Code, Section 1182(a)(2), as an alien who had been convicted of an aggravated felony.

In violation of Title 8, United States Code, Section 1327 and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, **RAYMOND SAUNDERS** and **CARLOS RODRIGUEZ-RODRIGUEZ**, have an interest.

2. Upon conviction of a violation of Title 8, United States Code, Section 1324, as alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6):

- a. any conveyance, including any vessel, vehicle, or aircraft, used in the commission of such offense;
- b. any property, real or personal, that constitutes, or is derived from, or is traceable to any proceeds obtained, directly or indirectly, from the commission of such offense; and

c. any property, real or personal, that was used to facilitate, or intended to be used to facilitate, the commission of such offense.

3. Upon conviction of a violation of Title 8, United States Code, Section 1327, as alleged in this Indictment, the defendant shall forfeit to the United States any proceeds, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Section 982(a)(6) 981(a)(1)(C) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1) and 28 U.S.C. § 2461(c).

A TRUE BILL:

FOREPERSON


MARKENZY LAPOINTE
UNITED STATES ATTORNEY


JOHN C. McMILLAN
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: 23-cr-14013-Cannon/Maynard

v.

RAYMOND SAUNDERS and,
CARLOS RODRIGUEZ-RODRIGUEZ,

Defendant.

Court Division (select one)

- ☐ Miami ☐ Key West ☒ FTP
☐ FTL ☐ WPB

CERTIFICATE OF TRIAL ATTORNEY***Superseding Case Information:**

New Defendant(s) (Yes or No)

Number of New Defendants

Total number of New Counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) Yes
List language and/or dialect: Spanish
4. This case will take 3 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I <input checked="" type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) Yes
If yes, Magistrate Case No. 23-8106-RMM
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of 02/27/2023
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shanick Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No

By: _____

John McMillan

Assistant United States Attorney

Court ID No. A5500228

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CARLOS RODRIGUEZ-RODRIGUEZ

Case No: ~~23-cv-8106-RMM~~ 23-cr-14013-Cannon/Maynard

Count # 1

Alien Smuggling for Purposes of Profit or Financial Gain

Title 8, United States Code, Sections 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(I)-(II), and 1324(a)(1)(B)(i)

- * **Max. Term of Imprisonment:** 10 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** not applicable
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000.00
- * **Special Assessment:** \$100.00
- * **Immigration Consequences of Removal (Deportation) from United States if Convicted**

Count # 2

Reentry After Deportation (for Aggravated Felony)

Title 8, United States Code, Sections 1326(a) and 1326(b)(2)

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** not applicable
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000.00
- * **Special Assessment:** \$100.00
- * **Immigration Consequences of Removal (Deportation) from United States if Convicted**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RAYMOND SAUNDERS

Case No: XXXXXXX 23-cr-14013-Cannon/Maynard
23-mj-8106-RMM

Count # 1

Alien Smuggling for Purposes of Profit or Financial Gain

Title 8, United States Code, Sections 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(I)-(II), and 1324(a)(1)(B)(i)

- * **Max. Term of Imprisonment:** 10 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** not applicable
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000.00
- * **Special Assessment:** \$100.00
- * **Immigration Consequences of Removal (Deportation) from United States if Convicted**

Count # 2

Reentry After Deportation

Title 8, United States Code, Section 1326(a)

- * **Max. Term of Imprisonment:** 2 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** not applicable
- * **Max. Supervised Release:** 1 year
- * **Max. Fine:** \$250,000.00
- * **Special Assessment:** \$100.00
- * **Immigration Consequences of Removal (Deportation) from United States if Convicted**

Count # 3

Knowingly Aiding or Assisting a Previously Removed Aggravated Felon to Enter the United States

Title 8, United States Code, Section 1327

- * **Max. Term of Imprisonment:** 10 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** not applicable
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000.00
- * **Special Assessment:** \$100.00
- * **Immigration Consequences of Removal (Deportation) from United States if Convicted**